

To: DEP  
17 State House Station  
Augusta, Maine 04333

From: Livermore Falls WWTF  
2 Maine St  
Livermore Falls, Maine 04254

Re: Comments on Androscoggin River TMDL

On page 4 you state that there is uncertainty in modeling, I believe we have to be absolutely certain to impose the strict limits in this TMDL. These limits have the potential to possibly close the small mill in Livermore Falls, which is a third of our tax base. These limits will adversely affect the jobs and economy of the entire Androscoggin Valley. We have to move forward slowly and wisely on this issue. From past data, all we will gain is reduction of a few days of low DO at the deep hole in Gulf Island Pond and a few minor algae blooms. What we could lose is much greater. I don't like the words maybe, probably, could, and likely in a report this important. UAA anyone???

In this report the phosphorus limits begin in May because of buildup in sediments, but in one of the older reports it was stated that there was no settling in May when the flow was high. We need to follow Paul's own method from page 7 (trial and error) to establish the accuracy of the model.

The report mentions in many places that the dam is only part of the problem, but it also says there would be non-attainment even if all point sources were removed, do to the dam. However in Paul's Feb,13,2003 alternative analysis report alternative #4 **Alter or Eliminate Impound Waters** states that this would eliminate **all** non-attainment . This tells me that the dam is 100% of the problem and removal should be put back on the table as an option or possibly some combination of flow control and more oxygen

injection by FPL. This might be more cost effective. Why isn't it being looked at?

The real mind twister is the phosphorus assimilation rates above IP and below IP. From the data in table 6 it appears that the assimilation is 60 times higher between Mead and IP than it is between IP and Twin Bridges. I have canoed both these sections of river and there is no explanation for this much difference in P uptake. The lower section is shallow and has miles of places full of weed beds and plant life, which create a good environment for phosphorus uptake. Do to the rain events last year how can there only be .3 # of OPO<sub>4</sub> from non-point at Twin Bridges? There is something very wrong with these numbers and this section of the river needs some further study before the assimilation amounts are accepted. (see attached sheet) Paul states on page 7 that" the use of accurate uptake rates is **critical** for establishing license limits" so it is **critical** that we get this right from more than one year of questionable data!

The word indigenous appears which means the river will be kept to a higher standard for the protection of brook trout. Your own Fish and Wildlife Dept. has said that the river will be managed for warm water species, which do not mix well with trout. Most sensible people realize that the extra cost associated with brook trout criteria will be spent with absolutely no return for the investment. By the way the dam is not indigenous. UAA anyone???

In conclusion, I feel that the upper part of the Androscoggin is going to be held to a higher standard and with a shorter time table for attainment than the river below Lewiston. Our section of the river will be in compliance and Lewiston-Auburn will be allowed many years longer to keep overflowing raw sewage (331,000,000 gal last year). Livermore Falls spent \$6 million and got rid of all of our CSOs . Now we have one of the highest sewer rates in the State (over \$600/year). The only way this TMDL should be implemented is if a complete UAA shows that the money spent will give us a good return for the investment. Why

isn't the compliance issue being applied to the entire Androscoggin River, and why isn't the NRC, DEP, and the downstream towns below LA outraged at the raw sewage flowing into the river?? (62 days last year). The current amount of development in LA is only going to make this situation worse in the near future. I remember when Farmington and Bethel had problems and the state told them "no new hook-ups until the problem is fixed". I remember quite vividly that Livermore Falls built a 2 MGD treatment plant and only got licensed for a 1 MGD plant in the summer months. Is there a special policy for Lewiston-Auburn and the lower section of the river? If so, please explain!!

Sincerely,

Kent Mitchell

Superintendent

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